

1 Jonathan M. Baum (SBN: 303469)  
2 **Steptoe & Johnson LLP**  
3 One Market Street  
4 Steuart Tower, Suite 1070  
5 San Francisco, CA 94105  
6 Telephone: (510) 735-4558  
7 jbaum@steptoe.com

Christopher J Morvillo (Admitted Pro Hac Vice)  
**Clifford Chance US LLP**  
31 West 52nd Street  
New York, NY 10019  
Telephone: (212) 878-3437  
christopher.morvillo@cliffordchance.com

Reid H. Weingarten (Admitted Pro Hac Vice)  
Brian M. Heberlig (Admitted Pro Hac Vice)  
Michelle L. Levin (Admitted Pro Hac Vice)  
Nicholas P. Silverman (Admitted Pro Hac Vice)  
**Steptoe & Johnson LLP**  
1114 Avenue of the Americas  
New York, NY 10036  
Telephone: (212) 506-3900

*Attorneys for Defendant*  
*Michael Richard Lynch*

11 **UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**

14 UNITED STATES OF AMERICA,

Case No.: 3:18-cr-00577-CRB

15 Plaintiff,

Judge: Hon. Charles Breyer

16 vs.

**DEFENDANT LYNCH'S MOTION FOR  
ADMINISTRATIVE RELIEF TO EXCEED  
PAGE LIMITATIONS FOR HIS MOTIONS  
TO DISMISS (1) COUNTS ONE THROUGH  
SIXTEEN OF THE SUPERSEDING  
INDICTMENT AND (2) COUNT  
SEVENTEEN OF THE SUPERSEDING  
INDICTMENT**

18 MICHAEL RICHARD LYNCH and  
19 STEPHEN KEITH CHAMBERLAIN,

Defendants.

22 Pursuant to Rule I.C of the Court's General Standing Order for Civil and Criminal Cases,  
23 Defendant Lynch moves for leave to exceed the fifteen-page limit for his two memoranda of points  
24 and authorities in support of (1) his Motion to Dismiss Counts One through Sixteen of the  
25 Superseding Indictment and (2) his Motion to Dismiss Count Seventeen of the Superseding  
26 Indictment (together, the "Motions"). Dr. Lynch seeks to file a memorandum of points and  
27 authorities of up to twenty-five pages in length in support of each of the Motions. Before filing  
28

1 this motion, Defendant Dr. Lynch conferred with the government. The government consents to  
2 this request.

3 Counts One through Fifteen of the Superseding Indictment (ECF No. 21) allege a vast and  
4 complex wire fraud scheme spanning nearly three years based on allegations of accounting fraud  
5 designed to artificially inflate the revenues of UK-based Autonomy and aimed at shareholders of  
6 Autonomy and also at potential purchasers of Autonomy, including HP. The allegations  
7 encompass potentially hundreds of transactions. Count Sixteen alleges a separate conspiracy to  
8 defraud purchasers of HP following the announcement of its intention to acquire Autonomy. An  
9 additional ten pages will allow Dr. Lynch to present several legal grounds for dismissing these  
10 allegations, each of which rests on different legal theories and is supported by different legal  
11 analyses.

12 Count Seventeen of the Superseding Indictment alleges a sprawling conspiracy under 18  
13 U.S.C. § 371, spanning over seven years and involving seventeen enumerated overt acts that  
14 allegedly furthered a conspiracy to commit four separate criminal objects: circumventing the  
15 internal accounting controls of an issuer in violation of 15 U.S.C. § 78m; tampering with witnesses,  
16 victims, and informants in violation of 18 U.S.C. § 1512; obstructing proceedings in violation of  
17 18 U.S.C. § 1505; and engaging in monetary transactions in violation of 18 U.S.C. § 1957. An  
18 additional ten pages will allow Dr. Lynch to adequately address the extensive and complex  
19 allegations in Count Seventeen.

20 Accordingly, Dr. Lynch respectfully requests an order from the Court permitting Dr. Lynch  
21 to file memoranda of points and authorities of up to twenty-five pages in length, exclusive of the  
22  
23  
24  
25  
26  
27  
28

1 table of contents, table of authorities, caption page, signature block, declaration(s), and exhibit(s),  
2 in support of the Motions.

3  
4 Dated: September 28, 2023

5 Respectfully submitted,

6  
7 /s/ Jonathan Baum  
8 Jonathan M. Baum (SBN: 303469)  
**Steptoe & Johnson LLP**  
9 One Market Street  
10 Steuart Tower, Suite 1070  
11 San Francisco, CA 94105  
Telephone: (510) 735-4558  
jbaum@steptoe.com

12 Reid H. Weingarten (Admitted Pro Hac Vice)  
13 Brian M. Heberlig (Admitted Pro Hac Vice)  
14 Michelle L. Levin (Admitted Pro Hac Vice)  
Nicholas P. Silverman (Admitted Pro Hac Vice)  
**Steptoe & Johnson LLP**  
15 1114 Avenue of the Americas  
16 New York, NY 10036  
17 Telephone: (212) 506-3900

18 Christopher J Morville (Admitted Pro Hac Vice)  
**Clifford Chance US LLP**  
19 31 West 52nd Street  
New York, NY 10019  
20 Telephone: (212) 878-3437  
christopher.morville@cliffordchance.com

21  
22 *Attorneys for Defendant*  
*Michael Richard Lynch*